

August 11, 1993

Ms. Mary L. McDaniel
Manager, Pipeline Safety
Transportation/Gas Utilities Division
Railroad Commission of Texas
Capitol Station - P.O. Box 12967
1701 N. Congress
Austin, TX 79711-2967

Dear Ms. McDaniel:

We have considered the Commission's order dated June 28, 1993, granting the Amerada Hess Corporation a waiver of compliance with the plastic pipeline standards in 49 CFR 192.59, 192.147, 192.191, 192.281(a) and (d)(1), and 192.63(a)(2). The waiver applies to two segments of a fiberglass gathering system that are located in Seminole, Texas, totaling 0.37 miles of pipeline.

According to information in your July 8, 1993, letter, the gathering line segments are in rural areas of Seminole, and present limited exposure to the public. The Commission concluded that replacing the segments with material in conformance with the above safety standards would not be safe, because of joining complications, pressure alternations, and corrosiveness of the gas. Further, the Commission has ordered Amerada to report any leak on the entire gathering system so the Commission can monitor the long-term integrity of the pipeline material and order remedial action if needed.

In view of the above and the Commission's public notices of the matter, which drew no comments from the public, we have no objection to the waiver.

Sincerely,

George W. Tenley, Jr.
Associate Administrator for
Pipeline Safety